

REMARKS

Reconsideration of the present application as amended is respectfully requested. Claim 23 has been amended. Claims 1-33 are currently pending.

Claims 1-33 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,330,976 to Dymetman et al. ("Dymetman"). Independent claim 1 is directed to an electronic reading system including "a formatted surface having an area that includes a specific part of an address pattern, wherein a unique position on the address pattern can be identified from an examination of a portion of the address pattern; an electronic reading device including a sensor for detecting at least a portion of the specific part of the address pattern; and a server associated with the specific part of the address pattern for receiving a message from the electronic reading device, said message sent in response to said detection, and for performing a function in response to said message." Applicant respectfully submits that Dymetman fails to teach or suggest at least the feature of independent claim 1 of "a formatted surface having an area that includes a specific part of an address pattern, wherein a unique position on the address pattern can be identified from an examination of a portion of the address pattern."

Dymetman describes a system in which a user may manipulate a detection device to capture images of portions of a hardcopy document, derive an action/medium identifier from a captured image, and provide the action/medium identifier to a network to produce an action through the network. Dymetman further describes in column 12, lines 29-56 and Figure 3 that the hardcopy document may be divided into a number of cells in which each cell includes machine-readable markings indicating: a cell boarder which must be distinguishable from cell contents; an indication of the orientation of the page; an encoded representation of a page-identifier; and an encoded representation of location information which defines the location of the cell within the page. Figures 5A-5B and 6A-6B of Dymetman describe examples of the storage of data in a single cell in which each cell includes a page identifier encoded in first section of a cell and a location code encoded in a second section of a cell. Column 13, lines 18-19 of Dymetman describe that "[l]ocalization identifies a cell (zone) on the page, not a point on the page." Accordingly, Applicant respectfully submits that the location information of Dymetman identifies the location of a cell on a page, not a unique position on an address pattern.

Dymetman further describes in column 13, lines 20-23 that “[w]ith this encoding, a complete cell must be within the region of the page from whose image a page-identifier and location code are to be obtained”, and that “[l]ess than a complete cell does not contain sufficient information.” Thus, in the system of Dymetman, the image of a complete cell must be detected in order to determine a page identifier and a location code associated with a particular cell. In addition, Applicant respectfully submits that there is no teaching or suggestion by Dymetman that the markings in each of the plurality of cells collectively form an address pattern on the page. Applicant respectfully submits that Dymetman contains no teaching or suggestion of a unique position on an address pattern that can be identified from an examination of a portion of the address pattern as found in independent claim 1. Applicant respectfully submits that independent claim 1 distinguishes over Dymetman and requests that the 35 U.S.C. 102(e) rejection of independent claim 1 be withdrawn.

Independent claim 23 has been amended to include the feature of “detecting a portion of an address pattern on a formatted surface of an object using an electronic reading device, wherein a unique position on the address pattern can be identified from an examination of a portion of the address pattern.” Support for the amendment to claim 23 can be found at at least page 9, line 16 to page 10, line 21 and claim 1 of the specification as originally filed. For similar reasons as those discussed with respect to independent claim 1, Applicant respectfully submits that independent claim 23 distinguishes over Dymetman and requests that the 35 U.S.C. 102(e) rejection of independent claim 23 be withdrawn.

Claims 2-22 and 24-33 are dependent upon and include the limitations of independent claims 1 and 23, respectively. For at least the reasons as discussed with respect to independent claims 1 and 23, Applicant respectfully submits that claims 2-22 and 24-33 distinguish over Dymetman and requests that the 35 U.S.C. 102(e) rejection of claims 2-22 and 24-33 be withdrawn.

Applicant has recently filed separate Information Disclosure Statements on May 18, 2004; May 21, 2004; May 26, 2004; and June 8, 2004. Applicant respectfully requests that the Examiner consider these Information Disclosure Statements and initial the corresponding Form 1449/PTO forms.

In view of the above, each of the presently-pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

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Respectfully submitted,

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